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Attorneys for PAYVISION B.V., a Netherlands limited liability company

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA, SOUTHERN DIVISION

T1 PAYMENTS LLC, a Nevada limited
liability company,

Plaintiff,

vs.

BEYOND WEALTH PTE LLC, a Utah
limited liability company,

Defendant.

CASE No. 2:20-CV-01405-JCM-VCF

**STIPULATION TO EXTEND TIME FOR
BEYOND WEALTH PTE LLC TO
RESPOND TO PAYVISION B.V.'S
MOTION TO DISMISS FIRST AMENDED
COUNTERCLAIM**

BEYOND WEALTH PTE LLC, a Utah
limited liability company,

Counterclaimant,

vs.

T1 PAYMENTS LLC, a Nevada limited
liability company, et al.,

Counterclaim-Defendants.

1 Counterclaimant Beyond Wealth PTE LLC, a Utah limited liability company ("Beyond
2 Wealth") and Counterclaim-Defendant Payvision B.V., a Dutch limited liability company
3 ("Payvision"), through their respective counsel, hereby stipulate and agree as follows:

4 WHEREAS, on November 9, 2020, Payvision filed a motion to dismiss ("Motion")
5 Beyond Wealth's First Amended Counterclaim ("FAC");

6 WHEREAS, pursuant to Local Rule LR 7-2, Beyond Wealth has fourteen days to file a
7 response to the Motion, which would be Monday, November 23, 2020;

8 WHEREAS, on November 19, 2020, Beyond Wealth has presented Payvision with
9 potential settlement options, which Payvision will require certain time to review;

10 WHEREAS, on November 20, 2020, counsel for Beyond Wealth and counsel for
11 Payvision agreed to extend the time for Beyond Wealth to respond to the Motion for a period of
12 two weeks, until December 7, 2020, and for Payvision to reply to Beyond Wealth's response until
13 December 14, 2020;

14 NOW, THEREFORE, Beyond Wealth and Payvision hereby stipulate and agree as
15 follows:


- 16 1. Beyond Wealth's response to the Motion shall be due December 7, 2020;
- 17 2. Payvision's reply to Beyond Wealth's response to the Motion shall be due
18 December 14, 2020;
- 19 3. All discovery and Rule 26 disclosure deadlines between Beyond Wealth and
20 Payvision are also continued for a period of two weeks.

21 DATED: November __, 2020

DATED: November 23, 2020

22 GIBBS GIDEN LOCHER TURNER
23 SENET & WITTBRODT LLP

WELLMAN & WARREN LLP

24 By: 
25 Richard E. Haskin, Esq.
26 Attorneys for PAYVISION B.V., a
27 Netherlands limited liability company.

/s/
By: _____
Scott Wellman
Attorneys for Beyond Wealth PTE LLC, a
Utah limited liability company.

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA, SOUTHERN DIVISION**
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11 T1 PAYMENTS LLC, a Nevada limited
12 liability company,

13 Plaintiff,

14 vs.

15 BEYOND WEALTH PTE LLC, a Utah
16 limited liability company,

17 Defendant.

18 BEYOND WEALTH PTE LLC, a Utah
19 limited liability company,

20 Counterclaimant,

21 vs.

22 T1 PAYMENTS LLC, a Nevada limited
23 liability company, et al.,

24 Counterclaim-Defendants.
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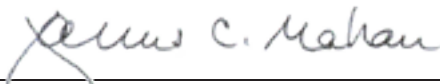
CASE No. 2:20-CV-01405-JCM-VCF

**[PROPOSED] ORDER GRANTING
STIPULATION TO EXTEND TIME FOR
BEYOND WEALTH PTE LLC TO
RESPOND TO PAYVISION B.V.'S
MOTION TO DISMISS FIRST AMENDED
COUNTERCLAIM**

1 This Court, having considered the foregoing stipulation of the parties and finding good
2 cause therefore, **IT IS ORDERED** that:

- 3 1. Beyond Wealth's response to Payvision's pending Motion to Dismiss shall be due
4 December 7, 2020;
- 5 2. Payvision's reply to Beyond Wealth's response to the Motion shall be due
6 December 14, 2020;
- 7 3. All discovery and Rule 26 disclosure deadlines between Beyond Wealth and
8 Payvision are also continued for a period of two weeks.

9 DATED: December 2, 2020.

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11 _____
12 UNITED STATES DISTRICT JUDGE
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